



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

SCJ  
F. #2017R01691

*271 Cadman Plaza East  
Brooklyn, New York 11201*

December 13, 2019

By Fed-Ex

Kevin J. Keating, Esq.  
666 Old Country Road, Suite 900  
Garden City, New York 11530  
Attorney for Iskyo Aronov

Gordon Mehler, Esq.  
Mehler Law PLLC  
747 Third Avenue, 32nd Floor  
New York, New York 10017-2803  
Attorney for Michael Konstantinovskiy

Alan Futerfas, Esq.  
Ellen Resnick, Esq.  
The Law Offices of Alan S. Futerfas  
565 Fifth Ave., 7th Floor  
New York, NY 10017  
Attorneys for Tomer Dafna

Susan R. Necheles, Esq.  
Kathleen E. Cassidy, Esq.  
Hafetz & Necheles LLP  
10 E. 40th St., 48th Fl.  
New York, NY 10016  
Attorneys for Avraham Tarshish

Todd D. Greenberg  
Addabbo & Greenberg  
118-21 Queens Blvd. Suite 306  
Forest Hills, NY 11375  
Attorney for Michael Herskowitz

Re: United States v. Aronov et al.  
Criminal Docket No. 19-408 (MKB)

Dear Defense Counsel:

As reflected below, documents were provided to each of you via e-mail today in accordance with Rule 16 of the Federal Rules of Criminal Procedure, and pursuant to the protective order entered by the Court on December 3, 2019. The government also requests reciprocal discovery. The government will continue to provide discovery on a rolling basis.

<b><u>Defendant</u></b>	<b><u>BEGINNING BATES</u></b>	<b><u>ENDING BATES</u></b>
All defendants	EDNY-19CR408-000001	EDNY-19CR408-00068
Aronov	EDNY-IA-00000001	EDNY-IA-00000004
Konstantinovskiy	EDNY-MK-00000001	EDNY-MK-00000005
Dafna	EDNY-TD-00000001	EDNY-TD-00000338
Tarshish	EDNY-AT-00000001	EDNY-AT-00000097
Herskowitz	EDNY-MH-00000001	EDNY-MH-00000010

Also, please find enclosed a CD containing recordings made on or about and between February 28, 2019 and April 2, 2019, bates-stamped EDNY-19CR408-00000069 to EDNY-19CR408-00000074.

If you have any questions or requests regarding further discovery or a disposition of this matter, please do not hesitate to contact me.

Please be advised that, pursuant to the policy of the Office concerning plea offers and negotiations, no plea offer is effective unless and until made in writing and signed by authorized representatives of the Office. In particular, any discussion regarding the pretrial disposition of a matter that is not reduced to writing and signed by authorized representatives of the Office cannot and does not constitute a “formal offer” or a “plea offer,” as those terms are used in Lafler v. Cooper, 132 S. Ct. 1376 (2012), and Missouri v. Frye, 132 S. Ct. 1399 (2012).

Very truly yours,

RICHARD P. DONOGHUE  
United States Attorney

By: /s/  
Shannon C. Jones  
John Vagelatos  
Assistant U.S. Attorneys  
(718) 254-6379 (S. Jones)

Enclosures (1 CD)

cc: Clerk of the Court (MKB) (by ECF) (without enclosure)